

1 Michael V. Infuso, Esq., Nevada Bar No. 7388  
2 Keith W. Barlow, Esq., Nevada Bar No. 12689  
3 Sean B. Kirby, Esq., Nevada Bar No. 14224  
**GREENE INFUSO, LLP**  
3030 South Jones Boulevard, Suite 101  
Las Vegas, Nevada 89146  
Telephone: (702) 570-6000  
Facsimile: (702) 463-8401  
E-mail: minfuso @greeninfusolaw.com  
kbarlow@greeninfusolaw.com  
skirby@greeninfusolaw.com

7 Attorneys for Defendant GEM SA

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 BARTECH SYSTEMS INTERNATIONAL  
11 INC.,

Case No. 2:15-cv-02422-MMD-NJK

12 Plaintiff,

13 V

14 MOBILE SIMPLE SOLUTIONS, INC., a  
15 Delaware corporation, MOBILE SIMPLE  
16 SOLUTIONS (IAS), INC., a Canadian  
17 corporation, GEM SA, a Belgian  
corporation, VINCENT TESSIER, an  
individual, CHRISTELLE PIGEAT, an  
individual,

**STIPULATION AND ORDER FOR  
CONTINUANCE OF HEARING ON  
DEFENDANT GEM SA'S  
EMERGENCY MOTION TO  
LIFT/DISSOLVE AND/OR  
RECONSIDER THE PRELIMINARY  
INJUNCTION  
(First Request)**

18 Defendants

---

19 MOBILE SIMPLE SOLUTIONS, INC., a  
20 Delaware corporation, VINCENT  
21 TESSIER, an individual, CHRISTELLE  
PIGEAT, an individual,

22 Counterclaimants,

23 vs.

24 BARTECH SYSTEMS INTERNATIONAL  
25 INC., a Delaware corporation,

26 Counter-defendant.

---

27

28

1 Pursuant to the provisions of Federal Rule of Civil Procedure 6 and Local Rules IA 6-1,  
2 Plaintiff and Counter-defendant Bartech Systems International, Inc. (“Bartech”) and Defendant and  
3 Counterclaimant GEM SA (“GEM”), by and through their attorneys, hereby stipulate and agree to a  
4 continuance of the hearing on GEM’s Emergency Motion to Lift/Dissolve and/or Reconsider the  
5 Preliminary Injunction (“Motion to Lift”) currently scheduled for April 19, 2018 at 1:30 p.m.  
6 (“Hearing”). This is the first request for a continuation of the Hearing. GEM and Bartech hereby  
7 stipulate and agree to the following:

8 WHEREAS, this Court set a Hearing on the Motion to Lift for April 19, 2018;

9 WHEREAS, Defendant GEM’s counsel represents that unexpected issues arose on April  
10 17, 2018, at a trial on an unrelated matter in which Defendant GEM’s counsel is involved,  
11 thereby rendering GEM’s counsel unable to attend the Hearing;

12 WHEREAS, GEM and Bartech jointly agree to a continuation of the Hearing;

13 //

14 //

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

1 DATED this 18th day of April, 2018.

2 **GREENE INFUSO, LLP**

3  
4 /s/ Keith W. Barlow  
5 Michael V. Infuso, Esq.  
Nevada Bar No. 7388  
6 Keith W. Barlow, Esq.  
Nevada Bar No. 12689  
3030 South Jones Boulevard, Suite 101  
7 Las Vegas, Nevada 89146  
8 Attorneys for Defendant/Counterclaimant

DATED this 18th day of April, 2018.

**PARSONS BEHLE & LATIMER**

/s/ Michael R. Kealy  
*(Signed by filing attorney with permission of  
counsel)*  
Michael R. Kealy, Esq.  
Nevada Bar No. 971  
Ashley C. Nikkel, Esq.  
Nevada Bar No. 12838  
50 W. Liberty Street, Suite 750  
Las Vegas, Nevada 89501

– and –

**CONTI FENN & LAWRENCE LLC**

Gregory T. Lawrence, Esq.  
*(Admitted Pro Hac Vice)*  
Kyle S. Kushner, Esq.  
*(Admitted Pro Hac Vice)*  
36 S. Charles Street, Suite 2501  
Baltimore, Maryland 21201

Attorneys for Plaintiff/Counterdefendant

The hearing set for April 19, 2018 at 1:30 PM is vacated. The matter will be reset by the Courtroom Administrator.

IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

DATED: April 18, 2018